

EXHIBIT G

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7 UNITED STATES BANKRUPTCY COURT
8 WESTERN DISTRICT OF WASHINGTON - TACOMA

9 SARAH HOOVER,

10 Debtor,

11
12 SARAH HOOVER,

13 Plaintiff,

14 v.

15 QUALITY LOAN SERVICE CORPORATION
16 OF WASHINGTON, PHH MORTGAGE
17 CORPORATION DBA PHH MORTGAGE
18 SERVICES, HSBC BANK USA, N.A. AS
19 TRUSTEE OF THE FIELDSTONE
20 MORTGAGE INVESTMENT TRUST, SERIES
21 2006-2, NEWREZ, LLC, IH6 PROPERTY
22 WASHINGTON, LP, DBA INVITATION
23 HOMES.

Defendants.

BK No. 19-42890- MJH

Adv No. 20-04002 – MJH

Chapter 7

FED.R.BANKR.P. 30(b)(1)
NOTICE OF VIDEO DEPOSITION
OF EMPLOYEE(s) OF
DEFENDANT HSBC BANK USA,
N.A. AS TRUSTEE OF THE
FIELDSTONE MORTGAGE
INVESTMENT TRUST, SERIES
2006-2 RESPONSIBLE FOR
POLICIES OR DIRECTIVES FOR
THE TREATMENT OF LOANS
AND MORTGAGE ACCOUNTS
OF DEBTORS INVOLVED IN
CHAPTER 7 BANKRUPTCY

To: All parties, through counsel:

PLEASE TAKE NOTICE that Plaintiff Sarah Hoover, by her undersigned counsel, hereby
gives notice pursuant to Fed. R. Civ. 30(b)(1) that she intends to take the oral deposition of Defendant

NOTICE OF DEPOSITION - 1

HENRY & DEGRAFF, PS
787 MAYNARD AVE S.
SEATTLE WA 98104
(206) 330-0595/F (206) 400-7609

1 HSBC BANK USA, N.A. AS TRUSTEE OF THE FIELDSTONE MORTGAGE INVESTMENT
2 TRUST, SERIES 2006-2's ("HSBC") employee(s) who are responsible for:

- 3 - Establishing a policy and/or procedure regarding remedying stay violations where a
4 property is foreclosed after a chapter 7 bankruptcy is filed;
- 5 - Establishing a policy and/or procedure regarding the notice of a borrower's bankruptcy
6 filing;
- 7 - Establishing a policy and/or procedure regarding the processing of a third party
8 authorization after a bankruptcy filing;
- 9 - Establishing a policy and/or procedure regarding the processing of a notice from an
10 unauthorized third party for a borrower's bankruptcy filing;
- 11 - Establishing a policy and/or procedure regarding the notice of a bankruptcy filing from
12 a confirmed successor in interest;
- 13 - Any training given to employees to remedy stay violations;
- 14 - Any training given to employees to address foreclosures following a bankruptcy filing;
- 15 - The creation of Risk Convergence Reports between January 1, 2019 and December 31,
16 2020 regarding the loan at issue in this lawsuit;

17 The deposition will be taken upon oral examination at the instance and request of the Plaintiff
18 in the above-entitled and numbered action before a notary public or other official authorized to
19 administer oaths at Anderson Santiago, PLLC, 787 Maynard Avenue South, Seattle, WA
20 commencing on March 25, 2020 at the hour of 1:30 pm.¹ The oral examination is subject to
21 continuance or adjournment from time to time or place until completed.

22
23 ¹ Plaintiff has designated the time and place identified here solely for the purpose of noting this
deposition. Plaintiff is willing to modify the scheduled deposition to a time, date, and location
convenient to the witness and parties.

1 Said deposition will be taken before a qualified notary public and is subject to continuance
2 and/or adjournment from time to time or place to place until completed. The notary public or duly
3 authorized officer qualified to administer oaths, and may be recorded by a videographer, at the
4 date, time, and location indicated above. Plaintiff also provides notice to the Defendants and
5 deponent that the deposition may be used at the time of trial.

6 This notice was served on the following counsel for the Defendant HSBC for whom the
7 deponent acts as an employee:

8 Robert W. Norman, Jr.
9 HOUSER, LLP
600 University St, Ste 1708
Seattle, WA 98101
10 bnorman@houser-law.com

11 Attorneys for Defendants PHH Mortgage Corporation, HSBC Bank USA, N.A., as
12 Trustee of the Fieldstone Mortgage Investment Trust, Series 2006-2 and NewRez, LLC

13 **YOU ARE FURTHER COMMANDED** to bring with you at said time and place, any
14 and all documents which you have reviewed and/or relied upon in preparation for your deposition
15 testimony.

16 DATED this 23 day of February 2021.

17 **HENRY & DEGRAFF, PS**

18 By: /s/ Christina L Henry
Christina L Henry, WSBA No. 31273
19 Attorney for Plaintiff
787 Maynard Ave. S.
20 Seattle, WA 98104
(206) 330-0595
21 (206) 400-7609 (fax)
chenry@hdm-legal.com
22
23

1 **CERTIFICATE OF SERVICE**

2 The undersigned certifies under the penalty of perjury according to the laws of the United
3 States and the State of Washington that on this date I caused to be served a copy of **FRBP**
4 **30(b)(1) Deposition of Defendant HSBC BANK USA, N.A. AS TRUSTEE OF THE**
FIELDSTONE MORTGAGE INVESTMENT TRUST, SERIES 2006-2 in the manner noted
below on the following individuals:

5 **McCARTHY & HOLTHUS, LLP**

Attn: Joseph Ward McIntosh

6 108 1st Ave S Ste 300

Seattle, WA 98104-2104

7 jmcintosh@mccarthyholthus.com

Attorney for Quality Loan Service Corp. of Washington

8 **HOUSER, LLP**

9 Robert W. Norman, Jr.

600 University St, Ste 1708

10 Seattle, WA 98101

bnorman@houser-law.com

11 Attorneys for Defendants PHH Mortgage Corporation, HSBC Bank USA, N.A., as Trustee of
12 the Fieldstone Mortgage Investment Trust, Series 2006-2 and NewRez, LLC

13 **SCHWEET LINDE & COULSON, PLLC**

John Anthony McIntosh

575 S. Michigan St

14 Seattle, WA 98108-3316

johnm@schweetlaw.com

15 Attorneys for Defendant IH6 Property Washington, L.P. dba Invitation Homes

16 ☒ [X] Via electronic service pursuant to agreement

17 ☐ [] Via Facsimile

☐ [.] Via First Class Mail (Deposited on this day for delivery)

18 ☐ [] Via Certified Mail, Return Receipt Requested

☐ [] Via Messenger

19 DATED this 23rd day of February, 2021 at Bothell, Washington.

21 /s/ Christina L Henry

Christina L Henry, WSBA# 31273